

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., et al., <sup>1</sup>	)	Case No. 01-01139 (AMC)
	)	(Jointly Administered)
Reorganized Debtor.	)	
	)	Hearing Date: September 9, 2019, at 10:00 a.m.
	)	Related Docket nos.: 33099 & 33102

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**STIPULATION AND AGREED ORDER RE MEDIATION OF CONTESTED MATTER  
RE CLAIM NO. 18496-1**

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The above-captioned reorganized debtor (the “Reorganized Debtor”) and claimant Montana Department of Environmental Quality (“MDEQ”) in the contested matter (the “Contested Matter”) regarding claim no. 18496-1 filed by MDEQ, stipulate as follows:

1. In accordance with the terms of the attached stipulation, MDEQ shall file a detailed estimated amended proof of claim and the parties agree to pursue mediation in an attempt to expeditiously estimate and liquidate such claims.
2. Mediation shall be conducted in accordance with the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and/or otherwise as may be agreed by the parties and the Mediator.

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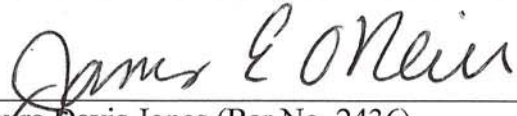
<sup>1</sup> W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or “Grace”) is the sole remaining “Reorganized Debtor,” and Case no. 01-1139 is the sole remaining open chapter 11 case.

Dated: September 9, 2019

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A. SO ORDERED.

B. This Order shall be effective and enforceable immediately upon entry and its provisions shall be self-executing and shall not be stayed under Fed. R. Bankr. P. 7062, Fed. R. Bankr. P. 9014 or otherwise.

Dated: Sept. 9, 2019

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Honorable Ashely M. Chan  
United States Bankruptcy Judge

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Stipulated Schedule for Submittal of  
Montana Amended Proof of Claim and the Parties' Mediation Schedule

Date	Event
August 30, 2019	Phone Conference (completed)
September 5, 2019	Phone Conference (completed)
September 9, 2019	Bankruptcy Court enters mutually proposed scheduling order for mediation
September 16, 2019	Parties file joint stipulation identifying mediator, or each party provides Court with two names of mediators acceptable to them
October 16, 2019	Mediator provides the parties with requirements for confidential mediation statements
November 20, 2019	Montana shares with Grace identification of claims and estimate of damages and method of calculation
November 27, 2019	Montana files detailed amended proof of claim stating their claims, the basis for those claims, and the estimated amounts sought for each such claim
December 31, 2019	Montana shares full expert report with Grace
January 31, 2020	Grace response to Montana expert report
February 7, 2020	Montana and Grace provide confidential submissions to mediator
Middle of February, 2020 (with specific dates in consultation with mediator)	First session of mediation for Montana to set out claims with experts present, then follow up session(s) to reconvene and attempt to resolve
February 28, 2020 (or alternate date specified by Court)	Status Hearing; mediator will provide report or certification of completion prior to status hearing